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14 MEDIATEK INC.

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Counter-Claim Plaintiff
FREESCALE SEMICONDUCTOR, INC.

18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**
20 **OAKLAND DIVISION**

21 MEDIATEK INC.

22 Plaintiff,

23 v.

24 FREESCALE SEMICONDUCTOR, INC.

25 Defendant.

Civil Action No. 4:11-cv-05341 (YGR)

**[PROPOSED] ORDER REGARDING
CLAIM CONSTRUCTION**

DEMAND FOR JURY TRIAL

Pursuant to a ruling by Hon. Yvonne Gonzalez Rogers during the Claim Construction Hearing that took place on November 28, 2012, Plaintiff MediaTek Inc. and Defendant Freescale Semiconductor, Inc. hereby jointly submit this Proposed Order regarding certain terms from U.S. Patent No. 6,889,331 (“’331 patent”).

The parties agree that the Court shall adopt the following construction for the term “determine.” As used in the ’331 patent claims, “determine” is construed to mean “ascertain by observation, examination, or calculation.” Accordingly, the parties agree that the Court need not construe the previously proposed term, “determine a voltage requirement based on a clock frequency requirement.”

Dated: December 20, 2012

Respectfully submitted,

MEDIATEK INC.

By their attorneys,

/s/ Craig E. Davis

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Respectfully submitted,

FREESCALE SEMICONDUCTOR, INC.

By their attorneys,

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12 *Counter-Claim Defendant* MEDIATEK INC.

13 Dated: December 21, 2012

14 **IT IS SO ORDERED.**

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16 HON. YVONNE GONZALEZ ROGERS
17 UNITED STATES DISTRICT COURT JUDGE
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